

GRAND TRAVERSE COUNTY
BROWNFIELD REDEVELOPMENT AUTHORITY

BROWNFIELD PLAN FOR
THE TBA CREDIT UNION
REDEVELOPMENT OF AND REUSE
OF THE PROPERTIES
LOCATED AT 626 AND 636 EAST FRONT STREET
TRAVERSE CITY, MICHIGAN

Prepared by:

Grand Traverse County Brownfield Redevelopment Authority
400 Boardman Avenue
Traverse City, Michigan 49684
Contact Person: Jean Derenzy
Email: jderenzy@grandtraverse.org
Phone: (734) 665-8825

AKT Peerless Environmental & Energy Services
12719 S. West Bay Shore Drive, Suite 8
Harbor West Building
Traverse City, Michigan 49684
Contact Person: Eric P. Helzer
Email: helzere@aktpeerless.com
Phone: (231) 941-2366

Approved by GTCBRA on: _ March 27 _____, 2013
Concurred by City of Traverse City on: _ April 25 _____, 2013
Approved by Grand Traverse County Board of Commissioners on: __ April 25 ____, 2013

**GRAND TRAVERSE COUNTY
BROWNFIELD REDEVELOPMENT AUTHORITY
BROWNFIELD PLAN**

TABLE OF CONTENTS

I.INTRODUCTION	7
A. General	7
II.GENERAL PROVISIONS	7
A. Description of Eligible Property (Section 13 (1)(h))	7
B. Basis of Eligibility (Section 13 (1)(h) , Section 2 (o))	9
C. Summary of Eligible Activities and Description of Costs (Section 13 (1)(a),(b))	10
D. Estimate of Captured Taxable Value and Tax Increment Revenues (Section 13(1)(c)); Impact of Tax Increment Financing on Taxing Jurisdictions (Section 13(1)(g), Section 2(ii))	12
E. Plan of Financing (Section 13(1)(d)); Maximum Amount of Indebtedness (Section 13(1)(e))	13
F. Local Site Remediation Revolving Fund (“LSRRF”) (Section 8, Section 13(1)(m))	13
G. Duration of Plan (Section 13(1)(f))	14
H. Effective Date of Inclusion in Brownfield Plan (Section 13(1)(f))	14
I. Displacement/Relocation of Individuals on Eligible Property (Section 13(1)(i-l))	14
J. Other Information (Section 13(1)(n))	14

III. ATTACHMENTS

A. Site Maps and Photographs

Figure 1 – Scaled Property Location Map

Figure 2 – Eligible Property Boundary Map

B. Legal Descriptions

C. Tables

Table 1 – MDEQ and MSF Eligible Activities

Table 2 – Tax Increment Financing Estimates

PROJECT SUMMARY

Project Name: TBA Credit Union - Redevelopment and Reuse of Properties Located at 626 and 636 East Front Street, Traverse City, Michigan

Developer: TBA Credit Union
2900 W. South Airport Rd.
Traverse City, Michigan 49684
Karen Browne
(231) 946-7141

Eligible Property Location: The Eligible Property is located at 626 and 636 East Front Street, Traverse City, Michigan. Parcel ID Numbers 28-51-102-003-10, and 28-51-102-006-00, respectively.

Type of Eligible Property: Facility

Project Description: The project (Project) consists of the redevelopment of the Property, which is located at 626 and 636 East Front Street in the City of Traverse City. The Project will include construction of a contemporary multi-story office and financial institution headquarters. The redevelopment includes environmental activities, non-environmental activities and economic development to further goals of the City of Traverse City, Grand Traverse County, the Michigan Department of Environmental Quality (MDEQ) and the Michigan Economic Development Corporation (MEDC). The comprehensive redevelopment of this site will include demolition of the existing structures (vacant gasoline station and restaurant buildings), remediation of soil and groundwater contamination, and redevelopment of a new 21,266 square foot three story building with a partially finished basement. The building will be the new TBA Credit Union corporate headquarters, as well as a new branch location.

There is an existing source area of hydrocarbon contamination in the vicinity of the former dispenser islands of the vacant gasoline station. Removal and/or treatment of this source area will be incorporated as a response activity for this project to ensure that it no longer adversely affects the quality of groundwater migrating from the site to the adjoining City of Traverse City Sunset Park and Traverse Bay.

TBA Credit Union is a strong supporter of the Traverse City community and is committed to putting these two underutilized properties back to productive use. The project will greatly improve the appearance of the area and be an attractive gateway building into the City. TBA Credit Union participates in several local volunteer activities, and it frequently conducts member and community educational seminars. In addition, TBA Credit Union often receives requests from organizations to house meetings and other events. The new building, therefore, is necessary for TBA Credit Union to further its goals of (a) better serving the community by offering more investment, mortgage, and commercial loan products, and (b) increasing civic participation.

The Project is seeking approval of Tax Increment Financing (TIF) and an MDEQ Brownfield Redevelopment Loan. Construction is expected to begin at the end of the 2nd quarter of 2013.

Eligible Activities:	Baseline Environmental Assessment (BEA) Activities {Phase I Environmental Site Assessment (ESA), Phase II ESAs, and BEA}, Due Care Activities, Additional Response Activities, Preparation of a Brownfield Plan and Act 381 Work Plan, Demolition, Lead and Asbestos Survey and Abatement, Site Preparation, Infrastructure Improvements, and Reasonable Costs of Environmental Insurance.
Reimbursable Costs:	\$2,821,034 (Est. Eligible Activities, Contingency, Interest) \$ (112,800) (GTCBRA 5% Withholding) <u>\$ 741,367</u> (LSRRF) \$3,449,601
Duration of Plan:	Estimated reimbursement of eligible activities is 22 years, not including administrative expenses and LSRRF deposits, which will extend tax capture (not to exceed 30 years)
Estimated Total Capital Investment:	\$7.285 million
Base Taxable Value:	\$933,700

List of Acronyms:

BEA	Baseline Environmental Assessment (Michigan process to provide new property owners and/or operators with exemptions from environmental liability)
BFP or Plan	Brownfield Plan
Developer	TBA Credit Union
Eligible Property	Property for property for which eligible activities are identified under a Brownfield Plan.
ESA	Environmental Site Assessment
FAR	Final Assessment Report
GTC	Grand Traverse County
GTC BOC	Grand Traverse County Board of Commissioners
GTCBRA	Grand Traverse County Brownfield Redevelopment Authority
LSRRF	Local Site Remediation Revolving Fund
MDEQ	Michigan Department of Environmental Quality
MEDC	Michigan Economic Development Corporation
MSF	Michigan Strategic Fund (agency that approves use of school tax revenue to support non-environmental Brownfield activities)
Phase I ESA	An environmental historical review and site inspection (no soil and/or groundwater sampling and analysis)
Phase II ESA	Environmental subsurface investigation (includes soil and/or groundwater sampling and analysis)
Property	The Eligible Property, located at 626 and 636 East Front Street, southwest of the intersection of East Front and Hope Streets in Traverse City, Grand Traverse County, Michigan. It comprises 2 parcels.
RCC	Residential Cleanup Criteria
RC	Restrictive Covenant
TIF	Tax Increment Financing (TIF describes the <i>process</i> of using TIR—i.e., TIF is the use of TIR to provide financial support to a project)
TIR	Tax Increment Revenue (incremental increase in property tax revenue, usually due to redevelopment and improvement that is generated by a property after approval of a Brownfield Plan)

I. INTRODUCTION

A. General

Grand Traverse County, Michigan (the “County”), established the Grand Traverse County Brownfield Redevelopment Authority (the “Authority”) on October 29, 1997, pursuant to Michigan Public Act 381 of 1996, as amended (“Act 381”). The primary purpose of Act 381 is to encourage the redevelopment of eligible property by providing economic incentives through tax increment financing for certain eligible activities.

This Brownfield Plan (“Plan”) serves dual purpose; to promote the redevelopment of and investment in certain “Brownfield” properties within the County, and to accomplish cleanup of environmental contamination on these properties. Inclusion of Property within this Plan will facilitate financing of environmental response and other eligible activities at eligible properties, and will also provide tax incentives to eligible taxpayers willing to invest in revitalization of eligible sites, commonly referred to as “Brownfields.” By facilitating redevelopment of Brownfield properties, this Plan is intended to promote economic growth for the benefit of the residents of the County and all taxing units located within and benefited by the Authority.

The identification or designation of a developer or proposed use for the Eligible Property that is the subject of this Plan shall not be integral to the effectiveness or validity of this Plan. This Plan is intended to apply to the Eligible Property identified in this Plan and, if tax increment revenues are proposed to be captured from that Eligible Property, to identify and authorize the eligible activities to be funded by such tax increment revenues. Any change in the proposed developer or proposed use of the Eligible Property shall not necessitate an amendment to this Plan, affect the application of this Plan to the Eligible Property, or impair the rights available to the Authority under this Plan.

This Plan is intended to be a living document, which may be modified or amended in accordance with the requirements of Act 381, as necessary to achieve the purposes of Act 381. The applicable sections of Act 381 are noted throughout the Plan for reference purposes.

This Plan contains information required by Section 13(1) of Act 381.

II. GENERAL PROVISIONS

A. Description of Eligible Property (Section 13 (1)(h))

The Eligible Property (“Property”) is located at 626 and 636 East Front Street, in Section 2 (Township 27 North /Range 11 West) in Traverse City, Grand Traverse County, Michigan. The Property is situated southwest of the intersection of East Front Street and Hope Street. The Property consists of two parcels that contain approximately 1.34 acres. The Property is located in an area of the City of Traverse City (“City”) that is characterized by commercial, multi-tenant residential, resort, and recreational properties. Grand Traverse Bay is nearby to the north, and the Property is abutted by surface roadways, municipal water, sanitary and storm sewer services, and electrical and gas utilities.

For ease of reference, AKT Peerless has designated each of the Eligible Property parcels with a letter. These designations have no relevance to legally recorded data about the Eligible Property. See Attachment A, Figure 2 – Eligible Property Boundary Map.

Parcel	Address	Tax Identification Number	Basis of Brownfield Eligibility	Approximate Acreage
A	626 East Front Street	28-51-102-003-10	Facility	0.84
B	636 East Front Street	28-51-102-006-00	Facility	0.50

The Property is zoned Hotel Resort District (HR). It currently contains two vacant commercial buildings (a former restaurant building on Parcel A, and a former gasoline station building on Parcel B). Exterior portions of the Property include paved parking areas, driveways, and landscaped areas. In addition, a wooden deck patio, a greenbelt area, and concrete dumpster enclosure are located on Parcel A; and a large canopy over two former pump islands, concrete, asphalt, gravel paved areas, and a small walk-in-cooler are located on Parcel B.

The Project proposes to redevelop an underutilized vacant property into a contemporary multi-story office and financial institution headquarters. The redevelopment integrates design elements, environmental cleanup, and economic development to further goals of the City of Traverse City, Grand Traverse County (GTC), the Michigan Department of Environmental Quality (MDEQ) and the Michigan Economic Development Corporation (MEDC). It will result in: (1) the community and municipal benefits of increased property taxes on the Property; (2) due care and additional response activities that will address the contamination on the Property, reducing the threat to human health and the environment; and (3) a substantial improvement to the appearance and aesthetics of the Property which will assist in increasing the property values of the neighboring community. The overall redevelopment of this site will include demolition of the existing structures, remediation, and redevelopment of a new 21,266 square foot three story building with a partially finished basement.

TBA Credit Union is a growing financial institution. In order to meet the demands of its members and to have space to hire additional staff, a new location is necessary. TBA Credit Union searched other properties that would have been more affordable, but it decided that it was most important to be located within the City to best serve its members and non-members alike.

TBA Credit Union has a strong desire to put these two vacant properties back to productive use and drastically improve the aesthetics of the neighborhood. TBA Credit Union is a large supporter of the community. It frequently participates in volunteer activities and conducts member and community educational seminars. A new building will allow TBA Credit Union the opportunity to provide expanded meeting and community event space to the neighboring community. TBA Credit Union's mission is to serve the community by building trusted relationships, providing customized financial

products, advocating financial literacy, and encouraging volunteerism. Redevelopment of this Property will ultimately help TBA Credit Union to meet its goals and that of the community.

Attachment A includes site maps of the Eligible Property, refer to: Figure 1, Scaled Property Location Map, Figure 2, Eligible Property Boundary Map (which includes lot dimensions). The legal descriptions of the parcel(s) included in the Eligible Property are presented in Attachment B.

The parcel and all tangible real and personal property located thereon will comprise the Eligible Property and is referred to herein as the “Property.”

B. Basis of Eligibility (Section 13 (1)(h) , Section 2 (o))

The Property is considered “Eligible Property” as defined by Act 381, Section 2 because: (a) the Property was previously utilized as a commercial property (gasoline station and restaurant); (b) it is located within the City of Traverse City, a qualified local governmental unit, or “Core Community” under Act 381; and (c) each of the parcels comprised by the Property has been determined to be a “facility.”

Parcel A contained railroad sidings and an associated platform from the 1910s to the 1970s, warehousing from the late 1920s to the 1970s, and a restaurant from the late 1970s until the late 2000s. Parcel B contained railroad sidings and a fruit warehouse from the 1910s to the late 1960s, a gasoline service station from the late 1960s to the early 2000s, and a produce stand from the mid-2000s to 2012.

On July 21, 2012 AKT Peerless completed a Phase I Environmental Site Assessment (ESA) for the Property on behalf of TBA Credit Union. Also in July 2012, AKT Peerless conducted a Phase II ESA on the Property. Prior subsurface investigations had been completed on the Property between 2001 and 2012 in association with the UST releases at 636 East Front Street. Based on analytical results obtained during the subsurface investigations conducted between 2001 and 2012, petroleum constituents (e.g., benzene, toluene, ethylbenzene, xylenes [BTEX], trimethylbenzene isomers [TMBs], etc.) were detected on the property at concentrations exceeding MDEQ Residential Cleanup Criteria (RCC).

On February 14 and 15, 2013, AKT Peerless conducted a Supplemental Phase II ESA including a soil gas evaluation to further evaluate contamination on the Property. Based on analytical results obtained during the 2013 Supplemental Phase II ESA, volatile including tetrachloroethylene and petroleum constituents (e.g., benzene, toluene, ethylbenzene, xylenes [BTEX], trimethylbenzene isomers [TMBs]) were detected in soil and groundwater on the property at concentrations exceeding MDEQ RCC and Non-Residential Cleanup Criteria (NRCC). Concentrations in soil were detected above the Groundwater-Surface Water Interface Protection (GSIP) criteria and Drinking Water Protection (DWP) criteria. Concentrations in groundwater were detected above the Groundwater-Surface Water Interface (GSI) criteria, Drinking Water (DW) criteria, and draft Groundwater Sump Concentrations for Vapor Intrusion (GSVI).

Therefore, Parcels A and B meet the definition of a “facility” as defined by Part 201 of NREPA, Michigan PA 451 of 1994, as amended.

A Restrictive Covenant (RC) for 636 East Front Street was submitted to the Register of Deeds by Blarney Castle in July 2012. The RC imposes requirements that users of the property must adhere to during redevelopment and future use. These RC requirements, along with the existing site conditions have created increased costs upon the proposed TBA Credit Union project. Excavation, dewatering, soil transportation and disposal, groundwater activities, storm water systems, engineered controls and vapor mitigation activities must be carefully managed during the redevelopment.

C. Summary of Eligible Activities and Description of Costs (Section 13 (1)(a),(b))

The “eligible activities” that are intended to be carried out at the Property are considered “eligible activities” as defined by Sec 2 of Act 381, because they include BEA Activities (Phase I ESA, Phase II ESAs, and BEA), due care activities, additional response activities, preparation of Brownfield and Act 381 work plans, lead and asbestos survey and abatement, demolition site preparation, infrastructure improvements, and the reasonable costs of environmental insurance (see Table 1). Response activities will include a focus on the cleanup of a source area of hydrocarbon contamination beneath the former dispenser island located on the vacant gas station site. Contaminated groundwater has been detected migrating from this area to the north to the Sunset Park property. Although impacted groundwater migrating from this source area does not appear to be currently reaching Traverse Bay, the ability to access the contamination in the future would be significantly adversely affected by the development should plume migration conditions change in the future. Accordingly, the completion of this project represents a unique opportunity to accomplish long term environmental benefits and protect the water resources within the City of Traverse City.

A summary of the eligible activities and the estimated cost of each eligible activity intended to be paid for with Tax Increment Revenues from the Property are shown in the table below. As shown, GTCBRA covers only 95% of eligible activity costs. The Developer is solely responsible for the remainder.

ESTIMATED COST OF REIMBURSIBLE ELIGIBLE ACTIVITIES

Description of Eligible Activities	Estimated Cost*
1. BEA Activities	\$ 36,011
2. Due Care Activities	\$ 695,373
3. Additional Response Activities	\$ 407,068
4. Environmental Insurance	\$ 50,000
5. Demolition	\$ 75,000
6. Lead & Asbestos Survey and Abatement	\$ 37,710
7. Site Preparation	\$ 554,849
8. Infrastructure Improvements	\$ 57,850
Subtotal \$	1,913,861
9. 15% Contingency**	\$ 281,677
10. GTCBRA Applications	\$ 30,470
11. Preparation of a Brownfield Plan	\$ 10,000
12. Preparation of Work Plans	\$ 20,000
Subtotal \$	2,256,008
13. GTCBRA 5% Withholding	\$ (112,800)
Subtotal \$	2,143,208
14. Interest***	\$ 565,026
15. LSRRF Deposits****	\$ 741,367
Total*****	\$ 3,449,600

*Estimated costs are subject to approval by MSF and MDEQ. Any costs not approved by the MSF or MDEQ may become local only costs paid out of captured tax increment revenues from locally levied millages (to the extent available).

**The contingency is applied to the Subtotal, excepting the BEA Activities, which have already been performed.

***Interest is calculated annually at 2.5% simple interest on unreimbursed eligible activities, in accordance with GTCBRA policy.

****LSRRF deposits will be made in accordance with Act 381.

*****Not including Authority administrative expenses

A detailed breakout of the eligible activities and the estimated cost of each eligible activity intended to be paid for with Tax Increment Revenues from the Property are shown in Attachment C, Table 1.

It is currently anticipated that construction will begin in June 2013 and be completed by December 2014.

The Developer desires to be reimbursed for the costs of eligible activities. Tax increment revenue generated by the Property will be captured by the Authority and used to

reimburse the cost of the eligible activities completed on the Property after approval of this Plan.

In accordance with this Plan and the associated Reimbursement Agreement, the amount advanced by the Developer will be repaid by the Authority, with possible interest being approved. In no event shall the interest rate exceed 2.5% simple interest. Payments will be made to the full extent incremental property tax revenues are or become available for such purpose under the Act. Based on the projected cost of eligible activities, interest reimbursement in this Plan is estimated at \$565,026, should the Brownfield Authority approve such interest. However, if the actual cost of eligible activities turns out to be lower than the above estimates, interest reimbursement may be lower, subject to the 2.5% simple interest calculation, should the Brownfield Authority approve such interest rate.

Tax increment revenues will first be used to pay or reimburse administrative expenses in accordance with Act 381. Capture of tax increment revenue for administrative expenses may extend the developer's reimbursement period. The amount of school tax revenues, which will be used to reimburse the costs of implementing eligible activities at this site, will be limited to the cost of eligible activities approved by the MDEQ and the MSF, together with the interest rate provided above. In the event that the use of school tax revenues to reimburse specific eligible activities is not approved by the MDEQ or MSF, these specific activities will be reimbursed with local-only TIF (to the extent available).

The costs listed in the table above are estimated costs and may increase or decrease depending on the nature and extent of environmental contamination and other unknown conditions encountered on the Property. The actual cost of those eligible activities encompassed by this Plan that will qualify for reimbursement from tax increment revenues of the Authority from the Property shall be governed by the terms of a Reimbursement Agreement with the Authority (the "Reimbursement Agreement"). No costs of eligible activities will be qualified for reimbursement except to the extent permitted in accordance with the terms and conditions of the Reimbursement Agreement.

D. Estimate of Captured Taxable Value and Tax Increment Revenues (Section 13(1)(c)); Impact of Tax Increment Financing on Taxing Jurisdictions (Section 13(1)(g), Section 2(ii))

This Plan anticipates the capture of tax increment revenues to reimburse the Developer for the costs of eligible activities under this Plan in accordance with the Reimbursement Agreement. A table of estimated tax increment revenues to be captured is attached to this Plan as Attachment C, Table 2. Tax increment revenue capture is expected to begin in 2015.

The total estimated cost of the eligible activities and other costs (including contingency, interest, and LSRRF deposits) to be reimbursed through the capture of tax increment revenue is projected to be \$3,449,600. This total does not include administrative expenses, the capture of which may lengthen the reimbursement period. The estimated effective initial taxable value for this Plan is \$933,700, and is based on land and real property tax only. Redevelopment of the Property is expected to initially generate

incremental taxable value in 2014 with the first significant increase in taxable value of approximately \$547,144 beginning in 2014.

It is estimated that the Authority will capture the 2014 through 2034 tax increment revenues to reimburse the cost of the eligible activities, reimburse interest, and deposit into the LSRRF. This estimate does not include capture for administrative expenses, which could lengthen the reimbursement period. The reimbursement period shall not exceed 22 years.

The captured incremental taxable value and associated tax increment revenue will be based on the actual increased taxable value from all taxable improvements on the Property and the actual millage rates levied by the various taxing jurisdictions during each year of the plan are shown in Attachment C, Table 2. The actual tax increment captured will be based on taxable value set through the property assessment process by the local unit of government and equalized by the County and the millage rates set each year by the taxing jurisdictions.

E. Plan of Financing (Section 13(1)(d)); Maximum Amount of Indebtedness (Section 13(1)(e))

Eligible activities are to be financed by the Developer, who has applied for a MDEQ Brownfield Redevelopment Loan. The Authority will reimburse the Developer for the cost of approved eligible activities, but only from tax increment revenues generated from the Property as available, and subject to the Reimbursement Agreement.

All reimbursements authorized under this Plan shall be governed by the Reimbursement Agreement. The Authority shall not incur any note or bonded indebtedness to finance the purposes of this Plan. The inclusion of eligible activities and estimates of costs to be reimbursed in this Plan is intended to authorize the Authority to fund such reimbursements and does not obligate the Authority or the County to fund any reimbursement or to enter into the Reimbursement Agreement providing for the reimbursement of any costs for which tax increment revenues may be captured under this Plan, or which are permitted to be reimbursed under this Plan. The amount and source of any tax increment revenues that will be used for purposes authorized by this Plan, and the terms and conditions for such use and upon any reimbursement of the expenses permitted by the Plan, will be provided solely under the Reimbursement Agreement contemplated by this Plan.

F. Local Site Remediation Revolving Fund (“LSRRF”) (Section 8, Section 13(1)(m))

The Authority has established a Local Site Remediation Revolving Fund (LSRRF). The Authority will capture incremental local and state school taxes to fund the LSRRF, to the extent allowed by law. The rate and schedule of incremental tax capture for the LSRRF will be determined on a case-by-case basis. Considerations may include, but not be limited to the following: total capture duration, total annual capture, project economic factors, level of existing LSRRF funding, projected need for LSRRF funds, and amount of school tax capture available in accordance with Act 381.

The amount of tax increment revenue authorized for capture and deposit in the LSRRF is estimated at \$741,367.

G. Duration of Plan (Section 13(1)(f))

The Plan shall not exceed 22 years following the date of the resolution approving the Plan. Further, in no event shall the beginning date of the capture of tax increment revenues be later than five years after the date of the resolution approving the Plan.

H. Effective Date of Inclusion in Brownfield Plan (Section 13(1)(f))

The Property will become a part of this Plan on the date this Plan is approved by the GTC BOC. The date of tax capture shall commence during the year construction begins or the immediate following year—as increment revenue becomes available, but the beginning date of tax capture shall not exceed five years beyond the date of the governing body resolution approving the Plan amendment.

I. Displacement/Relocation of Individuals on Eligible Property (Section 13(1)(i-l))

There are no persons or businesses residing on the Eligible Property, and no occupied residences will be acquired or cleared; therefore there will be no displacement or relocation of persons or businesses under this Plan.

J. Other Information (Section 13(1)(n))

The tax capture breakdown of tax increment revenues anticipated to be reimbursed to the Developer through this Plan is summarized below.

There are 51.0058 non-homestead mills available for capture, with school millage equaling 24.0000 mills (48%) and local millage equaling 27.0058 mills (52%). None of the project will include homestead residential property, with those properties including the State Education Tax and local ISD taxes. The requested tax capture for MSF and MDEQ eligible activities breaks down as follows:

<u>State to Local Tax Capture</u>	<u>Eligible Activities, Interest, Contingency</u>
MSF/MDEQ School tax capture (47%)	\$ 1,413,559
MSF/MDEQ Local tax capture (53%)	\$ 1,256,227
Local-Only tax capture	<u>\$ 38,447</u>
TOTAL	\$ 2,708,233*

*Does not include capture for LSRRF or Authority administrative costs

III. ATTACHMENTS

ATTACHMENT A

Site Maps and Photographs

ATTACHMENT B

Legal Descriptions

ATTACHMENT C

Tables